

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

JUSTIN GUY, individually and on  
behalf of those similarly situated,

Plaintiff,

Case No. 20-cv-12734-MAG-EAS  
HON. MARK A. GOLDSMITH

-v-

ABSOPURE WATER COMPANY, LLC,  
a domestic limited liability company,

Defendant.

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MORGAN & MORGAN, P.A.  
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& HARRINGTON, P.C.  
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**DEFENDANT ABSOPURE WATER COMPANY, LLC'S  
SECOND SUPPLEMENTAL RESPONSES TO PLAINTIFF'S  
FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS**

NOW COMES Defendant Absopure Water Company, LLC ("Absopure" or "Defendant")  
by and through its attorneys, CUMMINGS, MCCLOREY, DAVIS & ACHO, PLC, and for its Second  
Supplemental Responses to Plaintiff's First Set of Requests for Production of Documents,  
Absopure states as follows:

Spousal Restriction Affidavit	Absopure 000138		Hourly & Drivers Benefits Summary	Absopure 000170-000176
			Associate Handbook (Effective December, 2005)	Absopure 000177-000208

The Absopure Fleet Safety Program 2018 Edition is marked Bates Nos. 000748-000788.

**REQUEST FOR PRODUCTION NO. 10:**

Any and all collective bargaining agreements concerning Defendant's Truck Drivers in Michigan from 2017 to present.

**COMBINED RESPONSE TO REQUEST FOR PRODUCTION NO. 10:**

No documents exist.

**REQUEST FOR PRODUCTION NO. 11:**

The corporate or organizational chart of Defendant from October 8, 2017 to present.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 11:**

No formal organizational charts exist. However, an internal system known as "Workday" has compiled the information sought as a management structural hierarchy was previously provided and is marked Bates Nos. Absopure 000455-000473.

**REQUEST FOR PRODUCTION NO. 12:**

A copy of any written material posted at Defendant's workplace in Michigan regarding its Truck Drivers' rights under the Fair Labor Standards Act ("FLSA") from October 8, 2017 to present.

**COMBINED RESPONSE TO REQUEST FOR PRODUCTION NO. 12:**

No such records exist.

**REQUEST FOR PRODUCTION NO. 13:**

All marketing material sent to Defendant's customers in Michigan from October 8, 2017 to present.

**COMBINED RESPONSE TO REQUEST FOR PRODUCTION NO. 13:**

Representative pages from Absopure's website ([www.absopure.com](http://www.absopure.com)) from the At Home, At Work, Products and Blog drop down menus, are being provided. Also provided are recent postings from Absopure's Facebook page.

<b><u>Document</u></b>	<b><u>Bates No.</u></b>		<b><u>Document</u></b>	<b><u>Bates No.</u></b>
Absopure Website – At Home – Our Water	Absopure 000370-000373		Absopure Website – At Work – Office Water Filters	Absopure 000395-000399
Absopure Website – At Home – Water Delivery	Absopure 000374		Absopure Website – Products – Natural Spring Water	Absopure 000400-000406
Absopure Website – At Home – Cases	Absopure 000375-000376		Absopure Website – Products – Absopure Purified	Absopure 000407-000410
Absopure Website – At Home – Coolers	Absopure 000377-000378		Absopure Website – Products – Absopure Steam Distilled	Absopure 000411-000414
Absopure Website – At Work – Office Refreshment	Absopure 000379-000360		Absopure Website – Products – Absopure Plus	Absopure 000415
Absopure Website – At Work – Our Water	Absopure 000381		Absopure Website – Products – Amplify	Absopure 000416

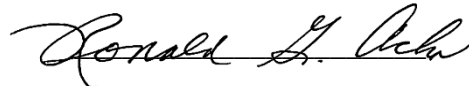
or control that is relevant to this lawsuit.

**COMBINED RESPONSE TO REQUEST FOR PRODUCTION NO. 86:**

See Affidavit of Patrick Byrne dated January 6, 2021, previously provided and marked Bates Nos. Absopure 000314-000319; Affidavit of Patrick Byrne dated October 12, 2021, previously provided and marked Bates Nos. Absopure 000737-000739; and Third Affidavit of Patrick Byrne dated December 13, 2021, previously provided and marked Bates Nos. Absopure 000735-000736.

Dated: December 15, 2021

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Ronald G. Acho".

Ronald G. Acho, P23913  
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**PROOF OF SERVICE**

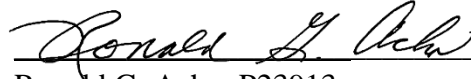
The undersigned hereby certifies that on December 15, 2021, he served copies of the  
following:

- Defendant's Absopure Water Company, LLC's Second Supplemental Responses to Plaintiff's Request for Production of Documents to Defendant.

Upon the following counsel of record:

Michael N. Hanna, Esq.  
Morgan & Morgan, P.A.  
2000 Town Center, Suite 1900  
Southfield, MI 48075

Electronically via email to Michael N. Hanna, Esq. at [mhanna@forthepeople.com](mailto:mhanna@forthepeople.com).

A handwritten signature in cursive script, reading "Ronald G. Acho", written in black ink.

Ronald G. Acho, P23913  
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